

### REMARKS

This application was originally filed on 2 June 1998 with ten claims, two of which were written in independent form. No claims have been allowed.

Claims 1-10 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,222,515 to Yamaguchi et al. ("Yamaguchi"). The applicant respectfully disagrees.

The applicant respectfully submits the Examiner once again has failed to meet the burden of proof required to establish a *prima facie* case of anticipation.

With respect to independent Claims 1 and 6, the Examiner has failed to point to any teaching in Yamaguchi that reasonably suggests "offsetting a first pixel value." Claim 1 recites, a method of displaying "digital video data comprising pixel values" including "offsetting a first pixel value a first predetermined amount to form a first offset pixel value." Yamaguchi does not show, teach, or suggest this limitation.

The Examiner has failed to point to any teaching in Yamaguchi that the pixel value of digital video data is offset. The Examiner merely points to teachings of Yamaguchi that drive a particular binary pixel value with a two or more voltages in order that the combination of the various voltages will have the same effect as driving the binary pixel value with an intermediate voltage. For example, one embodiment of Yamaguchi drives an LCD element with 4 volts and 2 volts to simulate driving the LCD element with 3 volts. Thus Yamaguchi does not offset the digital video data pixel value, but merely the voltage used to drive the LCD panel when the pixel value dictates the panel element should be driven.

Claims 2-5 and 7-10 depend from Claims 1 and 6 and should be deemed allowable for that reason and on their own merits. For the reasons argued above with respect to Claims 1 and 6, the Examiner has failed to present a *prima facie* case of anticipation and the rejections therefore should be withdrawn.

In view of the amendments and the remarks presented herewith, it is believed that the claims currently in the application accord with the requirements of 35 U.S.C. § 112 and are allowable over the prior art of record. Therefore, it is urged that the pending claims are in condition for allowance. Reconsideration of the present application is respectfully requested.

Respectfully submitted,



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